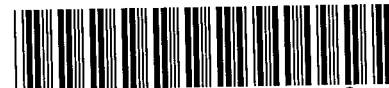


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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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AZ CORP COMMISSION

CARL J. KUNASEK

Chairman

JAMES M. IRVIN

Commissioner

WILLIAM A. MUNDELL

Commissioner

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[Signature]

DOCUMENT CONTROL

IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271
OF THE TELECOMMUNICATIONS
ACT OF 1996

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DOCKET NO. T-00000^A~~B~~-97-0238

ELI'S OSS POSITION
STATEMENT

Electric Lightwave, Inc. submits the following general position statement regarding Operations Support Systems. This statement is intended to be a general outline of ELI's position on OSS issues in this § 271 proceeding. At this stage of the proceeding, ELI's statement is preliminary and may be subject to change. It's not intended to be a complete and final presentation of ELI's § 271 case on OSS issues. ELI reserves the right to raise additional OSS issues. Also, ELI joins in the position statements and OSS requirements submitted by the other CLECs in this proceeding.

Unfortunately, ELI's initial exposure to U S WEST's IMA system in 1997 was not positive. U S WEST's IMA System didn't provide the functionality required for ELI's orders. ELI had substantial difficulties in ordering services through U S WEST's IMA system and due to U S WEST's restrictive policies on what products would be resold.

ELI continues to order interconnection trunks and special access trunks using U S WEST Access Service Request (ASR) process and U S WEST's EXACT system. For that reason, ELI has little recent experience with U S WEST's OSS for local service which is under review. But ELI continues to experience serious problems with U S WEST and access to U S WEST's network. Those problems result in serious concerns for ELI and ELI's customers. ELI believes many of these concerns may result from problems with U S WEST's OSS, among other things.

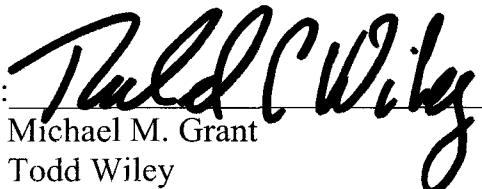
For the long term, ELI (in order to meet its evolving needs) will require a fully functional, real-time gateway to U S WEST's OSS for pre-ordering, ordering, provisioning, billing, maintenance and repair. "Fully functional" means that the real-time OSS gateway must provide ELI with non-discriminatory access to the appropriate U S WEST OSS to perform all pre-ordering, order, provisioning, billing, maintenance and repair functions on equal terms and conditions as U S WEST and its affiliates, agents, and companies in performing those functions for end-user customers.

Finally, ELI supports Staff's initiative to engage a third-party organization to plan, manage and implement OSS testing. Although ELI currently has numerous other pressing problems with U S WEST and access to U S WEST's network, proper interface with U S WEST's OSS is a very important issue that must be solved before future CLEC growth and competition can be realized fully. ELI will be an interested party to this testing, though probably not an active participant.

Again, ELI joins in the position statements and OSS requirements submitted by the other CLECs in this § 271 proceeding. ELI reserves the right to offer additional positions and testimony on OSS-related issues during this § 271 case.

RESPECTFULLY SUBMITTED this 3 day of September, 1999.

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